

Matthew J. Conroy, Esq., Trial Partner/ [MJC@schlawpc.com](mailto:MJC@schlawpc.com)

December 16, 2024

**VIA ECF (w/o enclosures) & email (w/ enclosures)**

[perkinsj@gtlaw.com](mailto:perkinsj@gtlaw.com)

[serbarolif@gtlaw.com](mailto:serbarolif@gtlaw.com)

[gina.fal detta@gtlaw.com](mailto:gina.fal detta@gtlaw.com)

[ioanna.zevgaras@shortandbilly.com](mailto:ioanna.zevgaras@shortandbilly.com)

[molluzzoj@gtlaw.com](mailto:molluzzoj@gtlaw.com)

[richardk@shortandbilly.com](mailto:richardk@shortandbilly.com)

[skip.short@shortandbilly.com](mailto:skip.short@shortandbilly.com)

Greenberg Traurig

900 Stewart Avenue

Garden City, NY 11530

Re: American Transit Insurance Company v. Pierre et al.

Civil Case No.: 1:24-cv-00360-RPK-CLP

Dear Counselors:

As you are aware, we represent Defendants, William A. Weiner, D.O., and Nexray Medical Imaging, P.C. d/b/a Soul Radiology Medical Imaging (“Nexray Defendants”), in the above-referenced action. Pursuant to Judge Kovner’s Individual Practice Rule IV(B)(3)(a), enclosed please find the following documents in support of Nexray Defendants’ Opposition to Plaintiff’s Motion for a Writ of Prejudgment Attachment:

- Memorandum of Law in Opposition to Plaintiff’s Motion for Writ of Prejudgment Attachment;
- Declaration of Matthew J. Conroy in Support of Opposition to Plaintiff’s Motion for Writ of Prejudgment Attachment and the following exhibits thereto:

Exhibit A – Expert Witness Report of Mark Zafrin;

Exhibit B – Correspondence of Matthew Andrews to Judge Gardephe dated August 09, 2024;

Exhibit C – Expert Report of Dr. Bryan Pukenas.

- Affidavit of Defendant, William A. Weiner, D.O., in Support of Opposition to Plaintiff’s Motion for Writ of Prejudgment Attachment and the following exhibit thereto:

Exhibit 1 – Financing Agreement.

In accordance with the above-referenced Individual Practices and Rules, a copy of this letter is being filed on ECF, but the foregoing documents will not be filed with the Court until the motion is fully briefed.

Very truly yours,  
SCHWARTZ CONROY & HACK, P.C.

By: /s/ Matthew J. Conroy  
Matthew J. Conroy

cc: Hon. Rachel P. Kovner (via ECF, w/out enclosures)  
Hon. Cheryl L. Pollak (via ECF, w/out enclosures)  
All Counsel of record via ECF (w/out enclosures)  
Adam Dressler, Esq. (attorney for defendant in default Bradley Pierre; courtesy copy w/encl. via email [adressler@dresslerfirm.com](mailto:adressler@dresslerfirm.com))  
Cary Goldinger, Esq. (attorney for defendant in default Bradley Pierre; courtesy copy w/encl. via email [csg@goldinger.com](mailto:csg@goldinger.com))